

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:)	
)	
CIRCUIT CITY STORES, INC., <u>et al.</u>, Debtors.)	Case No.: 08-35653-KRH
)	(Chapter 11)
CYNTHIA OLOWAY, INDIVIDUALLY AND AS SPECIAL ADMINISTRATOR OF THE ESTATE OF CEDRIC COY LANGSTON, JR., A DECEASED MINOR, Movant,)	
)	
v.)	
)	
CIRCUIT CITY STORES, INC., <u>et al.</u>, Respondent.)	

MOTION FOR JOINDER

COMES NOW Movant, Cynthia Olloway, Individually and as Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor (the “Movant”), by counsel, to respectively request permission from this Court to join in and/or move for joinder in the previously-filed *Motion for Relief from Automatic Stay of 11 U.S.C. § 362(a) With Supporting Memorandum of Law and Request for Shortened Notice and Expedited Hearing* with its accompanying Notice of Motion and Hearing and proposed orders granting the expedited hearing and underlying relief, filed on November 27, 2008, and the subsequently-filed *Amended Motion for Expedited Hearing*, filed on December 2, 2008, in the above-styled matter on behalf of the Funches family. Movant, Ms. Olloway is the parent of the fourth child, Cedric Coy Langston,

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Jr., who died in the same house fire that is the subject of the state court lawsuit brought by the Funches family in Cook County Circuit Court in Chicago, Illinois, and for which family, the aforementioned pleadings were filed in this matter. The Cook County Circuit Court has consolidated the Funches and Olloway underlying suits, they are styled separately but share the exact same defendants, and are assigned case number "04 CH16059 Consolidated with 05 L 3088 and 05 L 9762". Movant, Ms. Olloway seeks identical relief to the Funches family and respectfully requests that undersigned counsel be permitted (in light of their retention today) to present the same arguments at expedited hearing tomorrow, on December 3, 2008, on her behalf. The Funches and their counsel consent to this *Motion for Joinder*.

PRAYER FOR RELIEF:

WHEREFORE, the Movant, by counsel, respectfully requests that this Honorable Court (a) grant this *Motion for Joinder*; and (b) award Movant such other and further relief as this Court deems just and proper.

Dated: December 2, 2008

Respectfully Submitted,

**CYNTHIA OLOWAY, INDIVIDUALLY AND AS
SPECIAL ADMINISTRATOR OF THE ESTATE OF
CEDRIC COY LANGSTON, JR., A DECEASED
MINOR,**

By Counsel

/s/ Lisa Taylor Hudson

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December, 2008, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and was mailed, by U.S. Mail, first class, postage prepaid to all persons on the Service List below:

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